

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- V. -

SCOTT MARAIO,

Defendant.

COUNT ONE  
(Theft of Public Funds)

18 CRIM 410

# JUDGE STEIN

The United States Attorney charges:

1. From at least in or about October 2008 up to and including at least in or about February 2018, in the Southern District of New York and elsewhere, SCOTT MARAIO, the defendant, embezzled, stole, purloined, and knowingly converted to his use and the use of others, and without authority, sold, conveyed, and disposed of records, vouchers, money, and things of value of the United States and a department and agency thereof, to wit, the United States Social Security Administration ("SSA"), which exceeded the sum of \$1,000, and received, concealed, and retained the same with intent to convert it to his use and gain, knowing it to have been embezzled, stolen, purloined, and converted, to

wit, MARAIO fraudulently obtained approximately \$364,040 in Social Security disability benefits to which he was not entitled.

(Title 18, United States Code, Sections 641 and 2.)

**COUNT TWO**  
**(False Statements)**

The United States Attorney further charges:

2. From at least in or about October 2008 up to and including at least in or about February 2018, in the Southern District of New York and elsewhere, SCOTT MARAIO, the defendant, in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations, to wit, MARAIO submitted applications for and reports relating to Social Security disability benefits in which he falsely stated, among other things, that he did not work and had no earnings, when in fact he worked as a security guard at a strip club located in Manhattan, New York (the "Strip Club") from in or about October 2008 through in or about August 2014, and in positions relating to fire safety on construction sites from in or about July 2012 through at least in or about February 2018, earning a total of approximately \$450,000.

(Title 18, United States Code, Section 1001(a).)

COUNT THREE

(False Statements in Connection with Social Security Disability Benefits)

The United States Attorney further charges:

3. From at least in or about October 2008 up to and including at least in or about February 2018, in the Southern District of New York and elsewhere, SCOTT MARAIO, the defendant, made and caused to be made false statements and representations of a material fact for use in determining rights to payment under Subchapter II of Chapter 7 of Title 42 of the United States Code, to wit, MARAIO submitted applications for and reports relating to Social Security disability benefits in which he falsely stated, among other things, that he did not work and had no earnings, when in fact he worked as a security guard at the Strip Club from in or about October 2008 through in or about August 2014, and in positions relating to fire safety on construction sites from in or about July 2012 through at least in or about February 2018, earning a total of approximately \$450,000.

(Title 42, United States Code, Section 408(a)(3).)

FORFEITURE ALLEGATION

4. As a result of committing the offense charged in Count One of this Information, SCOTT MARAIO, the defendant, shall forfeit to the United States, pursuant to Title 18, United States

Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense that the defendant personally obtained.

**Substitute Assets Provision**

5. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

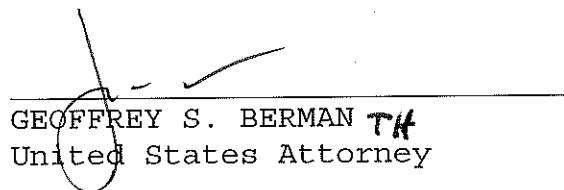
c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property.

(Title 18, United States Code, Section 981, Title 21, United States Code, Section 853, Title 28, United States Code, Section 2461.)

  
GEOFFREY S. BERMAN *TH*  
United States Attorney

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INFORMATION

18 Cr.

(18 U.S.C. §§ 641, 1001,  
and 2; 42 U.S.C. § 408)

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GEOFFREY S. BERMAN  
United States Attorney.

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